EXHIBIT D

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

DEVIN G. NUNES, Plaintiff, vs. CABLE NEWS NETWORK, INC., Defendants.	Civil No.: 3:19-CV-00889

DECLARATION OF VICKY WARD

I, VICKY WARD, first being duly sworn, declare as follows:

1. I am a senior reporter at Cable News Network, Inc. ("CNN"). I work at CNN's offices located in New York City. I also am a New York City resident.

2. I submit this Declaration in support of CNN's motion to transfer this case from the Eastern District of Virginia to the Southern District of New York.

3. I was the author and lead reporter for an online article published on November 22, 2019, titled: "Exclusive: Giuliani associate willing to tell Congress Nunes met with ex-Ukranian official to get dirt on Biden."

4. I wrote the article in New York. I maintain my reporting records with respect to the article in New York.

5. The primary source identified in the article is New York attorney Joseph Bondy, who represents Lev Parnas. I understand that Mr. Bondy is representing Mr. Parnas with respect to criminal charges brought by federal prosecutors in New York. During the course of my reporting, all of our interactions occurred in New York. It is my understanding that Mr. Bondy also lives in New York.

6. Three other CNN journalists were credited as contributors for the article: Michael Warren, Alex Rogers and Audrey Ash. They work out of CNN's bureau in Washington, DC.

7. Following the publication of the online article, on November 22, 2019, I appeared on CNN's *Cuomo Prime Time*, where I discussed the story with anchor Chris Cuomo. That telecast took place in New York, where *Cuomo Prime Time* is produced.

8. None of the reporting for the online article or for my appearance on *Cuomo Prime Time* took place in Virginia.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this Declaration was executed on January __16__, 2020.

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VICKY WARD

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